1 2	COOLEY LLP WHITTY SOMVICHIAN (194463) wsomvichian@cooley.com REECE TREVOR (316685)				
3	rtrevor@cooley.com 3 Embarcadero Center, 20th Floor				
4	San Francisco, CA 94111-4004				
5	Telephone: (415) 693-2000 Facsimile: (415) 693-2222				
6	REBECCA GIVNER-FORBES (Appearing pro	hac vice)			
7	rgf@cooley.com 1299 Pennsylvania Avenue, NW, Suite 700				
8	Washington, DC 20004-2400 Telephone: (202) 842-7800 Facsimile: (202) 842 7899				
9	Attorneys for Plaintiff GOOGLE LLC				
11	THE MORALES LAW FIRM				
12	DAVID P. MORALES (191229) morales@alum.mit.edu				
13	99 S. Almaden Blvd., Suite 600 San Jose, CA 95113				
14	Telephone: (888) 836-0880				
15	Attorneys for Defendants ETHAN QIQI HU, GMBEYE,				
16	and RAFADIGITAL LLC				
17	UNITED STATES DISTRICT COURT				
18	NORTHERN DISTRICT OF CALIFORNIA				
19	GOOGLE LLC, a Delaware limited liability	Case No. 3:23-cv-02964-JD			
20	company,	STIPULATION EXTENDING			
21	Plaintiff, v.	DEFENDANTS' TIME TO RESPOND TO COMPLAINT			
22	ETHAN QIQI HU, an individual; GMBEYE;	Civ. L.R. 6-1(A)			
23	RAFADIGITAL LLC, a Mississippi limited liability company; and DOES 1–20,				
24	Defendants.				
25					
26					
27					
28					
- 11					

## Case 3:23-cv-02964-JD Document 16 Filed 08/01/23 Page 2 of 6

1	Pursuant to Civil Local Rule 6-1(a), Plaintiff Google LLC and Defendants Ethan Qiqi Hu		
2	GMBEYE, and Rafadigital LLC, by and through their respective counsel, hereby stipulate as follow		
3	WHEREAS, on June 16, 2023, Plaintiff Google LLC filed a complaint against Defendant		
4	Ethan Qiqi Hu, GMBEYE, and Rafadigital LLC (the "Complaint," ECF No. 1) in the U.S. Distric		
5	Court for the Northern District of California;		
6	WHEREAS, on July 6, 2023, Plaintiff served the Complaint on Defendants;		
7	WHEREAS, the parties have agreed to extend the last day by which Defendants may answer		
8	or otherwise respond to the Complaint to September 5, 2023; and		
9	WHEREAS, the extension of Defendants' time to respond to the Complaint will not alter the		
10	date of any event or any deadline already fixed by Court order;		
11	NOW THEREFORE, IT IS HEREBY STIPULATED by and between the parties, through		
12	their respective counsel, to extend the last day by which Defendants may answer, move, or otherwise		
13	respond to the Complaint to September 5, 2023.		
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			

## Case 3:23-cv-02964-JD Document 16 Filed 08/01/23 Page 3 of 6

1	Dated: August 1, 2023	Respectfully submitted,
2		
3		By: /s/ Whitty Somvichian Whitty Somvichian
4		
5		COOLEY LLP WHITTY SOMVICHIAN (194463)
6		wsomvichian@cooley.com REECE TREVOR (316685)
7 8		rtrevor@cooley.com 3 Embarcadero Center, 20th Floor
9		San Francisco, CA 94111-4004 Telephone: (415) 693-2000 Facsimile: (415) 693-2222
10		
11		REBECCA GIVNER-FORBES (Appearing pro hac vice) rgf@cooley.com 1299 Pennsylvania Avenue, NW, Suite 700
12		Washington, DC 20004-2400 Telephone: (202) 842-7800
13		Facsimile: (202) 842 7899
14		Attorneys for Plaintiff GOOGLE LLC
15		GOOGLE ELC
16	Dated: August 1, 2023	Respectfully submitted,
17		
18		By: <u>/s/ David P. Morales</u> David P. Morales
19		
20		THE MORALES LAW FIRM DAVID P. MORALES (191229)
21		morales@alum.mit.edu 99 S. Almaden Blvd., Suite 600
22		San Jose, CA 95113 Telephone: (888) 836-0880
23		Attorneys for Defendants
24		ETHAN QIQI HU, GMBEYE, and RAFADIGITAL LLC
25		
26		
27		
28		

**ATTESTATION OF CONCURRENCE IN FILING** Pursuant to Civ. L.R. 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from counsel for Defendants. Dated: August 1, 2023 By: /s/ Whitty Somvichian Whitty Somvichian 

PROOF OF SERVICE

I am a citizen of the United States and a resident of the State of California. I am employed in San Francisco County, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years, and not a party to the within action. My business address is Cooley LLP, 3 Embarcadero Center, 20th Floor, San Francisco, California 94111-4004. On August 1, 2023 I served the documents described below in the manner described below:

## STIPULATION EXTENDING DEFENDANTS' TIME TO RESPOND TO COMPLAINT

- (BY U.S. MAIL) I am personally and readily familiar with the business practice of × Cooley LLP for collection and processing of correspondence for mailing with the United States Postal Service, and I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States Postal Service at San Francisco, California.
- (BY MESSENGER SERVICE) by consigning the document(s) to an authorized courier and/or process server for hand delivery on this date.
- (BY FACSIMILE) I am personally and readily familiar with the business practice of Cooley LLP for collection and processing of document(s) to be transmitted by facsimile and I caused such document(s) on this date to be transmitted by facsimile to the offices of addressee(s) at the numbers listed below.
- (BY OVERNIGHT MAIL) I am personally and readily familiar with the business practice of Cooley LLP for collection and processing of correspondence for overnight delivery, and I caused such document(s) described herein to be deposited for delivery to a facility regularly maintained by for overnight delivery.
- (BY ELECTRONIC MAIL) I am personally and readily familiar with the business practice of Cooley LLP for the preparation and processing of documents in portable document format (PDF) for e-mailing, and I caused said documents to be prepared in PDF and then served by electronic mail to the parties listed below.

on the following parties in this action:

22 David P. Morales The Morales Law Firm

99 S. Almaden Blvd., Suite 600

San Jose, California 95113

Phone: (888) 836-0880

Email: morales@alum.mit.edu

Attorneys for Defendants

Ethan Qiqi Hu, GMBEYE, and RAFADIGITAL LLC

28

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

23

24

25

26

27

## Case 3:23-cv-02964-JD Document 16 Filed 08/01/23 Page 6 of 6

1	Executed on August 1, 2023, at Sar	n Francisco, California.
2		
3		Marta Manne
4		Maita Narvaez
5	289431573	
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
w		PROOF OF SERVICE

COOLEY LLP ATTORNEYS AT LAW SAN FRANCISCO